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*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR

**DECLARATION OF VIOLA TREBICKA  
IN SUPPORT OF GOOGLE LLC'S  
OPPOSITION TO PLAINTIFFS'  
REQUEST FOR AN  
ORDER FOR GOOGLE TO SHOW  
CAUSE FOR WHY IT SHOULD NOT  
BE SANCTIONED FOR DISCOVERY  
MISCONDUCT**

The Honorable Susan van Keulen  
Date: April 21, 2022  
Time: 10:00 a.m.

Trial Date: None Set

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit  
4 this declaration in support of Google’s Opposition to Plaintiffs’ Request for an Order for Google to  
5 Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct. I make this  
6 declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could  
7 and would testify competently thereto.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of a document produced by  
9 Defendant in this action, on April 23, 2021, as GOOG-BRWN-00033225.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of a document produced by  
11 Defendant in this action, on June 18, 2021, as GOOG-BRWN-00175744.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by  
13 Defendant in this action, on June 18, 2021, as GOOG-BRWN-00181672.

14 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document produced by  
15 Defendant in this action, on June 18, 2021, as GOOG-BRWN-00182034.

16 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by  
17 Defendant in this action, on June 18, 2021, as GOOG-BRWN-00204684.

18 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by  
19 Defendant in this action, on September 30, 2021, as GOOG-BRWN-00525099.

20 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document produced by  
21 Defendant in this action, on October 5, 2021, as GOOG-BRWN-00536949.

22 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document produced by  
23 Defendant in this action, on September 1, 2021, as GOOG-CABR-00064421.

24 10. Attached hereto as **Exhibit 9** is a true and correct copy of a document produced by  
25 Defendant in this action, on September 1, 2021, as GOOG-CABR-00484343.

26 11. Attached hereto as **Exhibit 10** is a true and correct copy of a document produced by  
27 Defendant in this action, on September 1, 2021, as GOOG-CABR-00544408.

28

1           12.     Attached hereto as **Exhibit 11** is a true and correct copy of a document produced by  
2 Defendant in this action, on September 1, 2021, as GOOG-CABR-00547295.

3           13.     Attached hereto as **Exhibit 12** is a true and correct copy of a document produced by  
4 Defendant in this action, on September 2, 2021, as GOOG-CABR-00901891.

5           14.     Attached hereto as **Exhibit 13** is a true and correct copy of a document produced by  
6 Defendant in this action, on September 24, 2021, as GOOG-CABR-03668216.

7           15.     Attached hereto as **Exhibit 14** is a true and correct copy of a document produced by  
8 Defendant in this action, on September 1, 2021, as GOOG-BRWN-00023886.

9           16.     Attached hereto as **Exhibit 15** is a true and correct copy of a document produced by  
10 Defendant in this action, on June 18, 2021, as GOOG-BRWN-00176433.

11          17.     Attached hereto as **Exhibit 16** is a true and correct copy of a document produced by  
12 Defendant in this action, on September 24, 2021, as GOOG-CABR-03668991.

13          18.     Attached hereto as **Exhibit 17** is a true and correct copy of a document produced by  
14 Defendant in this action, on September 24, 2021, as GOOG-CABR-03669472.

15          19.     Attached hereto as **Exhibit 18** is a true and correct copy of a document produced by  
16 Defendant in this action, on September 24, 2021, as GOOG-CABR-03669574.

17          20.     Attached hereto as **Exhibit 19** is a true and correct copy of a document produced by  
18 Defendant in this action, on October 5, 2021, as GOOG-CABR-04324934.

19          21.     Attached hereto as **Exhibit 20** is a true and correct copy of a document produced by  
20 Defendant in this action, on October 6, 2021, as GOOG-CABR-04470006.

21          22.     Attached hereto as **Exhibit 21** is a true and correct copy of a document produced by  
22 Defendant in this action, on October 29, 2021, as GOOG-CABR-04796629.

23          23.     Attached hereto as **Exhibit 22** is a true and correct copy of a document produced by  
24 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285402.

25          24.     Attached hereto as **Exhibit 23** is a true and correct copy of a document produced by  
26 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285407.

27          25.     Attached hereto as **Exhibit 24** is a true and correct copy of a document produced by  
28 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285409.

1           26.     Attached hereto as **Exhibit 25** is a true and correct copy of a document produced by  
2 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285410.

3           27.     Attached hereto as **Exhibit 26** is a true and correct copy of a document produced by  
4 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285411.

5           28.     Attached hereto as **Exhibit 27** is a true and correct copy of a document produced by  
6 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285414.

7           29.     Attached hereto as **Exhibit 28** is a true and correct copy of a document produced by  
8 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285416.

9           30.     Attached hereto as **Exhibit 29** is a true and correct copy of a document produced by  
10 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285418.

11          31.     Attached hereto as **Exhibit 30** is a true and correct copy of a document produced by  
12 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285420.

13          32.     Attached hereto as **Exhibit 31** is a true and correct copy of a document produced by  
14 Defendant in this action, on November 24, 2021, as GOOG-CABR-05285422.

15          33.     Attached hereto as **Exhibit 32** is a true and correct copy of a letter dated January 25,  
16 2021 from Jonathan Tse to Beko Reblitz-Richardson.

17          34.     Attached hereto as **Exhibit 33** is a true and correct copy of a letter dated February 5,  
18 2021 from Josef Ansorge to Beko Reblitz-Richardson.

19          35.     Attached hereto as **Exhibit 34** is a true and correct copy of a letter dated July 16,  
20 2021 from Beko Reblitz-Richardson to Counsel for Defendant Google, LLC.

21          36.     Attached hereto as **Exhibit 35** is a true and correct copy of a letter dated October 1,  
22 2021 from Josef Ansorge to Special Master Douglas Brush.

23          37.     Attached hereto as **Exhibit 36** is a true and correct copy of a letter dated November  
24 9, 2021 from Erika Nyborg-Burch to Counsel for Defendant Google, LLC.

25          38.     Attached hereto as **Exhibit 37** is a true and correct copy of an email dated January  
26 11, 2022 from Sara Jenkins to Erika Nyborg-Burch.

27          39.     Attached hereto as **Exhibit 38** is a true and correct copy of an email dated February  
28 13, 2022 from Alex Frawley to Sara Jenkins.

1           40.     Attached hereto as **Exhibit 39** is a true and correct copy of transcript excerpts from  
2 the March 4, 2022 deposition of Bert Leung.

3           41.     Attached hereto as **Exhibit 40** is a true and correct copy of transcript excerpts from  
4 the December 3, 2021 deposition of Huei-Hung (Chris) Liao.

5           42.     Attached hereto as **Exhibit 41** is a true and correct copy of transcript excerpts from  
6 the March 8, 2022 deposition of Mandy Liu.

7           43.     Attached hereto as **Exhibit 42** is a true and correct copy of transcript excerpts from  
8 the March 10, 2022 deposition of Caitlin Sadowski.

9           44.     Attached hereto as **Exhibit 43** is a true and correct copy of transcript excerpts from  
10 the March 5, 2022 proceeding before Special Master Douglas Brush.

11           45.     Attached hereto as **Exhibit 44** is a true and correct copy of Mozilla Corporation's  
12 Objections and Response to Subpoena to Produce Documents, Information or Objects, dated August  
13 27, 2021.

14           46.     Attached hereto as **Exhibit 45** is a true and correct copy of a letter dated September  
15 20, 2021 from Sean Pinner to Ryan J. McGee in response to subpoena to Apple Inc.

16           47.     Attached hereto as **Exhibit 46** is a true and correct copy of Microsoft Corporation's  
17 Objections and Responses to Plaintiffs' Subpoena, dated August 27, 2021.

18           48.     Attached hereto as **Exhibit 47** is a true and correct copy of excerpts from the  
19 transcript of proceedings before the Special Master on March 23, 2022.

20           49.     Attached hereto as **Exhibit 48** is a true and correct copy of excerpts from Plaintiffs'  
21 Requests for Production to Defendant Google, Set Two, dated October 19, 2020.

22           50.     Attached hereto as **Exhibit 49** is a true and correct copy of transcript excerpts from  
23 the June 16, 2021 deposition of Glenn Berntson, pursuant to FRCP 30(b)(6).

24           51.     Attached hereto as **Exhibit 50** is a true and correct copy of a document produced by  
25 Defendant in this action, on July 31, 2021, as GOOG-BRWN-00432930.

26           52.     Attached hereto as **Exhibit 51** is a true and correct copy of a document produced by  
27 Defendant in this action, November 6, 2020, as GOOG-BRWN-00000152.

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1 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
2 and correct. Executed in Los Angeles, California on April 4, 2022.

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5 By /s/ Viola Trebicka  
6 Viola Trebicka  
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